


# EXHIBIT A

<b>CHARGE OF DISCRIMINATION</b> This form is affected by the Privacy Act of 1974: See Privacy Act Statement before completing this form.  #		<b>AGENCY</b> <input checked="" type="checkbox"/> IDHR <input checked="" type="checkbox"/> EEOC		<b>CHARGE NUMBER</b>	
<b>Illinois Department of Human Rights and EEOC</b>					
<b>NAME OF COMPLAINT (indicate Mr. Ms. Mrs.)</b>  Martin Chaidez			<b>TELEPHONE NUMBER (include area code)</b>  Counsel: 773-881-9000		
<b>STREET ADDRESS</b>  Bizzieri Law Offices, 10258 South Western, Ste. 210		<b>CITY, STATE, ZIP CODE</b>  Chicago, Illinois		<b>DATE OF BIRTH</b>  <div style="background-color: black; width: 100px; height: 20px;"></div>	
<b>NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (IF MORE THAN ONE, LIST BELOW)</b>					
<b>NAME OF RESPONDENT</b>  Ford Motor Company, Harvey, Illinois		<b>NUMBER OF EMPLOYEES, MEMBERS +15</b>  		<b>TELEPHONE NUMBER (include area code)</b>  773-646-3100	
<b>STREET ADDRESS</b>  12600 South Torrence Avenue		<b>CITY, STATE, ZIP CODE</b>  Chicago, Illinois 60633		<b>COUNTY</b>  Cook	
<b>CAUSE OF DISCRIMINATION BASED ON:</b>  Discrimination in hiring based on race and/or national origin			<b>DATE OF DISCRIMINATION EARLIEST (ADEA/EPA) LATEST (ALL)</b>  August-November 2015 <input type="checkbox"/> CONTINUING ACTION		
<b><u>S E E   A T T A C H E D</u></b>					
Page 1 of 2					
I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.			<b>SUBSCRIBED AND SWORN TO BEFORE ME</b>  THIS <u>7</u> DAY OF <u>March</u> , <u>2016</u> <u>Christopher L. Panio</u> NOTARY SIGNATURE		
<div style="border: 2px solid black; padding: 10px; width: fit-content; margin: auto;"> <b>OFFICIAL SEAL</b>  <b>CHRISTOPHER L PANIO</b>          Notary Public - State of Illinois          My Commission Expires Mar 3, 2019       </div> NOTARY STAMP			<u>X</u> <u>Martin Chaidez</u> <u>3/7/16</u> SIGNATURE OF COMPLAINANT (DATE)  I declare under penalty that the foregoing is true and correct I swear or affirm that I have read the above charge and that is is true to the best of my knowledge, information and belief		

### PARTICULARS

1. I am an individual of Hispanic origin.
2. On August 13, 2015 I applied to be a line worker at the Ford Motor Company plant in Harvey, Illinois ("Ford") through the Harvey, Illinois unemployment office.
3. I filled out a pre-application questionnaire.
4. I am qualified for the position of line worker.
5. Several months after my application, I received a letter from Ford and was informed that I was not hired.
6. Beginning in or around 2013, Allan Millender, African-American, became responsible for establishing hiring practices at Ford.
7. Allan Millender was granted this position despite having been terminated based charges of discrimination against him. Millender was reinstated and has since been allowed by Ford to continue his discriminatory practices, specifically, in the area of hiring.
8. As part of the hiring process Millender established, line workers were allegedly exclusively hired through the Harvey, Illinois unemployment office.
9. By agreement with the Harvey unemployment office, Hispanic applicants are allowed to apply and take pre-employment tests, but rarely pass basic skills testing.
10. In the event that Hispanic applicants do pass basic skills testing, their application process is stalled in some other way to preclude employment at Ford.
11. Indeed, the Hispanic applicants that are considered by Ford are rarely, if ever hired.
12. Mr. Millender's agreement with the Harvey unemployment office has ensured a gross underrepresentation of Hispanic workers at Ford.
13. Local towns boast the following Hispanic populations: Hammond, Indiana (34%), Calumet City, Illinois (15%); Dixmoor, Illinois (46.6%), Midlothian, Illinois (20%), Harvey, Illinois (19%).
14. Ford and its agent Millender have created a process to either intentionally discriminate against Complainant on the basis of his race and/or have created a hiring process that has a disparate impact on Hispanic applicants.
15. Complainant is aware of several other, non-Hispanic individuals, who have been hired at Ford without having to take a basic skills test or otherwise go through pre-employment testing.
16. Complainant is aware of several other, non-Hispanic individuals, who have been hired through the Harvey, Illinois unemployment office.



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<b>Illinois Department of Human Rights and EEOC</b>			
NAME OF COMPLAINT (indicate Mr. Ms. Mrs.)		TELEPHONE NUMBER (include area code)	
Stephanie Galan		Counsel: 773-881-9000	
STREET ADDRESS	CITY, STATE, ZIP CODE		DATE OF BIRTH
Bizzieri Law Offices, 10258 South Western, Ste. 210	Chicago, Illinois		
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NAME OF RESPONDENT	NUMBER OF EMPLOYEES, MEMBERS +15	TELEPHONE NUMBER (include area code)	
Ford Motor Company, Harvey, Illinois		773-646-3100	
STREET ADDRESS	CITY, STATE, ZIP CODE		COUNTY
12600 South Torrence Avenue	Chicago, Illinois 60633		Cook
CAUSE OF DISCRIMINATION BASED ON:		DATE OF DISCRIMINATION EARLIEST (ADEA/EPA) LATEST (ALL)	
Discrimination in hiring based on race and/or national origin		August-November 2015	
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  NOTARY STAMP		X <u>Stephanie Galan</u> <u>2-18-16</u> SIGNATURE OF COMPLAINANT      DATE  I declare under penalty that the foregoing is true and correct I swear or affirm that I have read the above charge and that is true to the best of my knowledge, information and belief	

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2. On August 13, 2015, and in September 2015, I applied to be a line worker at the Ford Motor Company plant in Harvey, Illinois ("Ford") through the Harvey, Illinois unemployment office.
3. I filled out a pre-application questionnaire and took a pre-employment basic skills test.
4. I am qualified for the position of line worker.
5. Several months after my application, I received a letter from Ford and was informed that I was not hired.
6. Beginning in or around 2013, Allan Millender, African-American, became responsible for establishing hiring practices at Ford.
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<b>Illinois Department of Human Rights and EEOC</b>			
NAME OF COMPLAINT (indicate Mr. Ms. Mrs.)		TELEPHONE NUMBER (include area code)	
Jessica Galan		Counsel: 773-881-9000	
STREET ADDRESS	CITY, STATE, ZIP CODE		DATE OF BIRTH
Bizzieri Law Offices, 10258 South Western, Ste. 210	Chicago, Illinois		
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3. I filled out a pre-application questionnaire.
4. I am qualified for the position of line worker.
5. I never received any further information about potential employment at Ford from Ford, or the Harvey unemployment office.
6. Later in 2015, I returned to the Harvey, Illinois unemployment office and I sought employment at Ford. I was instructed to go online to the Illinois Department of Employment Security website to apply. I did so and was never contacted for a position of line worker.
7. Beginning in or around 2013, Allan Millender, African-American, became responsible for establishing hiring practices at Ford.
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<b>Illinois Department of Human Rights and EEOC</b>					
NAME OF COMPLAINT (indicate Mr. Ms. Mrs.)  Kevin Zuniga			TELEPHONE NUMBER (include area code)  Counsel: 773-881-9000		
STREET ADDRESS  Bizzieri Law Offices, 10258 South Western, Ste. 210		CITY, STATE, ZIP CODE  Chicago, Illinois		DATE OF BIRTH  <div style="background-color: black; width: 100px; height: 30px;"></div>	
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NAME OF RESPONDENT  Ford Motor Company, Harvey, Illinois		NUMBER OF EMPLOYEES, MEMBERS +15  773-646-3100		TELEPHONE NUMBER (include area code)	
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NAME OF COMPLAINT (indicate Mr. Ms. Mrs.)  Antonio Zuniga				TELEPHONE NUMBER (include area code)  Counsel: 773-881-9000	
STREET ADDRESS  Bizzieri Law Offices, 10258 South Western, Ste. 210		CITY, STATE, ZIP CODE  Chicago, Illinois		DATE OF BIRTH  <div style="background-color: black; width: 100px; height: 30px;"></div>	
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<b>NAME OF COMPLAINT (indicate Mr. Ms. Mrs.)</b>  Antoinette DelReal				<b>TELEPHONE NUMBER (include area code)</b>  Counsel: 773-881-9000	
<b>STREET ADDRESS</b>  Bizzieri Law Offices, 10258 South Western, Ste. 210		<b>CITY, STATE, ZIP CODE</b>  Chicago, Illinois		<b>DATE OF BIRTH</b>  <div style="background-color: black; width: 100px; height: 20px;"></div>	
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Stacy DelReal		Counsel: 773-881-9000	
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		<input checked="" type="checkbox"/> CONTINUING ACTION	
<b><u>S E E   A T T A C H E D</u></b>			
I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		<b>SUBSCRIBED AND SWORN TO BEFORE ME</b>  THIS <u>18</u> DAY OF <u>February</u> , <u>2016</u> . <u>Christopher Panio</u> NOTARY SIGNATURE	
<div style="border: 2px solid black; padding: 10px; width: fit-content; margin: auto;"> <b>OFFICIAL SEAL</b>  <b>CHRISTOPHER L PANIO</b>          Notary Public - State of Illinois          My Commission Expires Mar 3, 2019       </div> NOTARY STAMP		X <u>Stacy DelReal</u> <u>02-18-2016</u> SIGNATURE OF COMPLAINANT      DATE  I declare under penalty that the foregoing is true and correct I swear or affirm that I have read the above charge and that is true to the best of my knowledge, information and belief	



PARTICULARS

1. I am an individual of Hispanic origin.
2. In September 2014, February 2015, and August 2015, I applied to be a line worker at the Ford Motor Company plant in Harvey, Illinois ("Ford") through the Harvey, Illinois unemployment office.
3. I filled out a pre-application questionnaire.
4. I am qualified for the position of line worker.
5. I have never received word from the Harvey unemployment office or Ford as to the status of my application and I have not been hired. However, since the time of my applications I am aware that multiple classes have been hired to be line workers at Ford through the Harvey unemployment office.
6. Beginning in or around 2013, Allan Millender, African-American, became responsible for establishing hiring practices at Ford.
7. Allan Millender was granted this position despite having been terminated based charges of discrimination against him. Millender was reinstated and has since been allowed by Ford to continue his discriminatory practices, specifically, in the area of hiring.
8. As part of the hiring process Millender established, line workers were allegedly exclusively hired through the Harvey, Illinois unemployment office.
9. By agreement with the Harvey unemployment office, Hispanic applicants are allowed to apply and take pre-employment tests, but rarely pass basic skills testing.
10. In the event that Hispanic applicants do pass basic skills testing, their application process is stalled in some other way to preclude employment at Ford.
11. Indeed, the Hispanic applicants that are considered by Ford are rarely, if ever hired.
12. Mr. Millender's agreement with the Harvey unemployment office has ensured a gross underrepresentation of Hispanic workers at Ford.
13. Local towns boast the following Hispanic populations: Hammond, Indiana (34%), Calumet City, Illinois (15%); Dixmoor, Illinois (46.6%), Midlothian, Illinois (20%), Harvey, Illinois (19%).
14. Ford and its agent Millender have created a process to either intentionally discriminate against Complainant on the basis of her race and/or have created a hiring process that has a disparate impact on Hispanic applicants.
15. Complainant is aware of several other, non-Hispanic individuals, who have been hired at Ford without having to take a basic skills test or otherwise go through pre-employment testing.
16. Complainant is aware of several other, non-Hispanic individuals, who have been hired through the Harvey, Illinois unemployment office.